

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

_____	)	
BLUE HILLS OFFICE PARK LLC,	)	
Plaintiff/Defendant-in-	)	
Counterclaim	)	
	)	
v.	)	Civil Action No. 05-CV-10506 (WGY)
	)	
CREDIT SUISSE FIRST BOSTON	)	
MORTGAGE SECURITY CORP.,	)	
Defendant.	)	
	)	
and	)	
	)	
CSFB 1999 – C1 ROYALL STREET, LLC	)	
Defendant/Plaintiff-in-	)	
Counterclaim	)	
	)	
and	)	
	)	
WILLIAM LANGELIER and GERALD	)	
FINEBERG,	)	
Defendants-in-Counterclaim	)	
_____	)	

**PLAINTIFF’S MOTION FOR AN EXTENSION OF  
TIME TO FILE RESPONSIVE PLEADINGS**

In accordance with United States District Court Local Rule 7.1, Blue Hills Office Park, LLC, William Langelier and Gerald Fineberg hereby move for a brief time extension until July 13, 2005 (inclusive of that date) to file responsive pleadings in connection with the Counterclaim asserted by the defendant in the above-captioned action.

In support of their motion, the movants aver and assert as follows:

1. The time extension is requested so that the movants can have an opportunity to review and comment on the draft responsive pleadings prepared by counsel. Because of the

July 4<sup>th</sup> holiday and various vacation schedules, the undersigned has not had an opportunity to review the draft pleadings with each of the movants as of this date.

2. There are no other motions pending and this is the first request for a time extension made by the movants. Previously, the plaintiff has consented to the defendant's request for additional time to move or answer the Complaint which requests have been granted by this Court.

3. In accordance with Local Rule 7.1(a)(2), the undersigned attempted to contact defendant's counsel, Randolph Tucker, to get his client's consent to this motion. However, the undersigned was advised that Attorney Tucker's office is closed today.

4. The additional time requested by the movants will enable the undersigned to have adequate time to confer with the movants with respect to the pleadings to be filed in response to the defendant's Counterclaim. The brief time extension requested will not otherwise delay these proceedings.

WHEREFORE, the movants respectfully request that their motion be granted and that they be granted such other and further relief as is proper and just.

Respectfully submitted,

Plaintiff/Defendant-in-Counterclaim,  
BLUE HILLS OFFICE PARK LLC  
By its attorneys,

/s/Peter B. McGlynn

Dated: July 5, 2005

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